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July 14, 2021

VIA ECF

Honorable Michael A. Hammer
United States District Court for the
District of New Jersey
Martin Luther King Courthouse
50 Walnut Street Room 2C
Newark, NJ 07101

**Re: *United States v. Matthew Goetsche, et al., 19-CR-877 (CCC)*
Proposed Modification of Pretrial Release Order**

Dear Judge Hammer:

Please accept this letter in lieu of a more formal motion on behalf of Defendant Matthew Goetsche. We respectfully move for leave of the Court to permit Mr. Goetsche to temporarily remove the lien on 4734 Essex Court, Boulder, CO 80301 (the “Essex Court House”) for (90) days to allow Victoria Landerman, the owner of Essex Court House and a third-party custodian, to market and sell the house solely to satisfy her mortgages and for her personal use.

As set forth in the Release Order (dkt. 171), the Court accepted the Essex Court House along with eight other U.S. properties, collectively worth approximately \$8,600,000.00, to partially secure the \$20,000,000.00 bond. The estimated equity in December 2020 in the Essex Court House was approximately \$350,000.00.

Upon any sale of the Essex Court House within the allotted (90) days, Ms. Landerman shall have the entirety of the sale proceeds wired directly into an attorney escrow account, and \$350,000.00 of the sale proceeds, *i.e.*, the equivalent of the estimated equity in December 2020, shall be promptly wired to the Clerk of the Court to replace the Essex Court House as partial security for the bond. Any remaining balance of the sale proceeds shall be wired directly to Ms. Landerman and shall be used solely by Ms. Landerman to satisfy her debt obligations and for her personal use. None of the sale proceeds shall be given directly or indirectly to Mr. Goetsche. If the house is not sold within (90) days, Mr. Goetsche shall either seek additional leave to permit Ms. Landerman to continue to market and sell the property or he shall place another lien on the Essex Court House.

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Pretrial Services has no objection to our proposed request. The government, through AUSA Jamie Hoxie, consents to our request. Thank you in advance.

Respectfully submitted,

/s/ Rodney Villazor

Rodney Villazor, Esq.
SMITH VILLAZOR LLP

cc: Andrew Lourie, Esq.
Benjamin Sauter, Esq.
Amanda Tuminelli, Esq.
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